

STEVEN L. BESHEAR

GOVERNOR

ENERGY AND ENVIRONMENT CABINET

LEONARD K. PETERS
SECRETARY

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
200 FAIR OAKS LANE
FRANKFORT, KENTUCKY 40601
www.kentucky.gov

FACT SHEET

KENTUCKY POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT TO DISCHARGE TREATED WASTEWATER INTO WATERS OF THE COMMONWEALTH

KPDES No.: KY0072231 Permit Writer: Sara Beard Date: June 9, 2009

AI No.: 2956

1. SYNOPSIS OF APPLICATION

a. Name and Address of Applicant

Gerdau Ameristeel US Inc. P.O. Box 468 Calvert City, Kentucky 42029

b. Facility Location

Gerdau Ameristeel US Inc. 1035 Shar-Cal Road Calvert City, Marshall County, Kentucky

c. Description of Applicant's Operation

Gerdau Ameristeel is a carbon steel hot rolling mill (SIC Code 3312).

d. Production Capacity of Facility

1,870,864 lbs/day - Hot Forming Process

e. Description of Existing Pollution Abatement Facilities

Outfall 001 - Process, cooling (contact and non-contact), filter backwash, and sanitary (internal Outfall 002) wastewaters and stormwater runoff are treated in the settling clarifier prior to discharge.

Outfall 002 - Internal monitoring point for the sanitary wastewaters prior to discharge through Outfall 001.

Outfall 003 - No treatment of stormwater runoff.

f. Permitting Action

This permitting action involves a reissuance of a minor KPDES permit for a new source carbon steel mill.



2. RECEIVING WATERS

a. Receiving Water Name

Outfall 001 discharges to the Tennessee River at latitude $37^{\circ}03'12''$ longitude $88^{\circ}23'51''$. Outfall 002 is an internal outfall to 001.

Outfall 003 discharges to an unnamed tributary to Little Cypress Creek at latitude $37^{\circ}02'52''$ longitude $88^{\circ}23'30''$.

b. Stream Segment Use Classifications

This segment of the Tennessee River is classified as a Warmwater Aquatic Habitat, Primary Contact Recreation, Secondary Contact Recreation, and Outstanding State Resource Water.

The unnamed tributary to Little Cypress Creek is classified as a Warmwater Aquatic Habitat, Primary Contact Recreation, Secondary Contact Recreation, and Domestic Water Supply.

c. Stream Segment Antidegradation Categorization

The Tennessee River and unnamed tributary to Little Cypress Creek are categorized as High Quality Waters.

d. Stream Low Flow Condition

At the point of discharge the 7Q10 and the Harmonic Mean for the Tennessee River are 5,000 cfs and 40,283 cfs, respectively.

At the point of discharge the 7Q10 and the Harmonic Mean for the unnamed tributary to Little Cypress Creek are 0.0 cfs and 0.0 cfs, respectively.

3. REPORTED DISCHARGE AND PROPOSED LIMITS

Description of Discharge - Outfall 001 - Process, cooling (contact and non-contact), filter backwash, and sanitary (internal Outfall 002) wastewaters and stormwater runoff are treated in the settling clarifier prior to discharge.

Effluent Characteristics	Reported Di Monthly			imits Daily	Applicable Water Quality Criteria and/or Effluent		
Flow (MGD)	Average 0.070	Maximum 0.190	Average Report	Maximum Report	Guidelines 401 KAR 5:065, Section 2(8)		
Hardness (as mg/l CaCO ₃)	113	121	Report	Report	401 KAR 5:065, Section 2(8)		
Total Suspended Solids (lbs/day)	8.87	18.60	37.3	94.0	401 KAR 5:065, Sections 4 and 5 401 KAR 10:031, Section 4 401 KAR 5:045, Sections 2 and 3 401 KAR 5:080, Section 1(2)(c)2		
Oil & Grease (lbs/day)	N/R	6.23	N/A	20.4	401 KAR 5:065, Sections 4 and 5		
Temperature (°F)	65.0	37.7	95.0	100.0	401 KAR 10:031, Section 4(1) 401 KAR 10:029, Section 4 401 KAR 5:080, Section 1(2)(c)		
Total Recoverable Metals (mg/l)	0.07	0.09	Report	Report	401 KAR 5:065, Section 2(8)		
Acute Toxicity (TU_a)	N/R	1.25	N/A	5.19	401 KAR 10:029, Section 5		
pH (standard units)	6.0(min)	8.2(max)	6.0(min)	9.0(max)	401 KAR 5:065, Sections 4 and 5 401 KAR 10:031, Section 4		

The data contained under the reported discharge columns is from the analysis of the Discharge Monitoring Reports (DMRs) data that has been reported during the term of the current permit.

The term Total Recoverable Metals means those metals listed on Form C, Section V, Part C - Metals, Cyanide, and Total Phenols: Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc.

The abbreviations N/R and N/A mean not reported on the Discharge Monitoring Report (DMR) and not applicable, respectively.

4. METHODOLOGY USED IN DETERMINING LIMITATIONS

a. Serial Number

Outfall 001 - Process, cooling (contact and non-contact), filter backwash, and sanitary (internal Outfall 002) wastewaters and stormwater runoff are treated in the settling clarifier prior to discharge.

b. Effluent Characteristics

Flow Hardness Total Suspended Solids
Oil & Grease Temperature Total Recoverable Metals
Acute Toxicity pH

c. Pertinent Factors

The hot rolling wastewaters are subject to the "New Source Performance Standards" (NSPS) requirements of the Hot strip and sheet mills, carbon and specialty Subsection of the Flat mills Section of Subpart G - Hot Forming Subcategory of the Iron and Steel Manufacturing Point Source Category (40 CFR 420.74).

Gerdau Ameristeel requested a mixing zone for Acute Toxicity and Temperature at this outfall. After review of the multi-port diffuser information submitted by the permittee, the Division of Water has determined that two different mixing zones will be granted for Acute Toxicity and Temperature. The physical description of both mixing zones can be found in Section 11 of this Fact Sheet.

A summarization of the effluent guidelines, water quality standards, assumptions, and calculations can be found in Attachment A - Regulatory Requirements.

A summarization of the toxicity and thermal mixing zone models can be found in Fact Sheet Attachment B - CORMIX Diffuser Model - Toxicity and Fact Sheet Attachment C - CORMIX Diffuser Model - Temperature, respectively.

d. Monitoring Requirements

Flow shall be monitored instantaneously twice per month.

pH shall be monitored once per day by grab sample.

Hardness, Total Suspended Solids, Oil & Grease, Temperature, and pH shall be monitored twice per month by grab sample.

Total Recoverable Metals shall be monitored once per quarter by grab sample. The results of the analyses shall be total and reported as a single concentration on the DMR. The laboratory bench sheets showing the results for each metal shall be attached to the DMR.

Acute Toxicity shall be monitored once per quarter by a minimum of two (2) grab samples collected over a 24-hour period as descriped in Part IV of the Permit.

e. Justification of Limits

The Kentucky Administrative Regulations (KARs) cited below have been duly promulgated pursuant to the requirements of Chapter 224 of the Kentucky Revised Statutes (KRSs).

Flow, Hardness, and Total Recoverable Metals

The monitoring requirements for these parameters are consistent with the requirements of 401 KAR 5:065, Section 2(8).

4. METHODOLOGY USED IN DETERMINING LIMITATIONS - continued

e. Justification of Limits - continued

Total Suspended Solids

The limits for this parameter are consistent with the requirements of 401 KAR 5:065, Sections 4 and 5, 401 KAR 10:031, Section 4, 401 KAR 5:045, Sections 2 and 3, and 401 KAR 5:080, Section 1(2)(c)2. These limits are representative of the "New Source Performance Standards" (NSPS) requirements of the Hot Forming Subcategory of the Iron and Steel Manufacturing Point Source Category (40 CFR 420.74). Section 4 of 10:031 establishes water quality criteria for the protection of Kentucky's waters. Sections 2 and 3 of 5:045 require biochemically degradable wastewaters to receive secondary treatment. Section 1(2)(c)2 of 401 KAR 5:080 represents Division of Water's "Best Professional Judgement" (BPJ) determination of the allowable contribution of TSS to the final effluent limit from the stormwater runoff and filter backwash wastestreams.

Oil & Grease

The limits for this parameter are consistent with the requirements of 401 KAR 5:065, Sections 4 and 5. This limit is representative of the "New Source Performance Standards" (NSPS) requirements of the Hot Forming Subcategory of the Iron and Steel Manufacturing Point Source Category (40 CFR 420.74).

Temperature

The limits for this parameter are consistent with the requirements of 401 KAR 10:031, Section 4, 401 KAR 10:029, Section 4, and 401 KAR 5:080, Section 1(2)(c)2.

Acute Toxicity

The requirements for this parameter are consistent with the requirements of 401 KAR 10:031, Section 4.

Нq

The limits for this parameter are consistent with the requirements of 401 KAR 10:031, Section 4 (Kentucky Water Quality Standards) and 401 KAR 5:065, Sections 4 and 5. These limits are representative of the "New Source Performance Standards" (NSPS) requirements of the Hot Forming Subcategory of the Iron and Steel Manufacturing Point Source Category (40 CFR 420.74).

5. REPORTED DISCHARGE AND PROPOSED LIMITS

Description of Discharge - Outfall 002 - Internal monitoring point for the sanitary wastewaters prior to discharge through Outfall 001.

Effluent Characteristics	Reported D: Monthly Average	ischarge Daily Maximum	Proposed L Monthly Average	imits Daily Maximum	Applicable Water Quality Criteria and/or Effluent Guidelines
Flow (MGD)	0.0003	0.001	Report	Report	401 KAR 5:065, Section 2(8)
$BOD_5 \ (mg/l)$	6.24	6.24	30	45	401 KAR 10:031, Section 4 401 KAR 5:045, Sections 3 and 5
Total Suspended Solids (mg/l)	5.74	5.78	30	45	401 KAR 10:031, Section 4 401 KAR 5:045, Sections 2 and 3
Escherichia Coli (N/100 ml)	N/R	N/R	130	240	401 KAR 10:031, Section 7 401 KAR 5:045, Section 4 401 KAR 5:080, Section 1(2)(c)2
Fecal Coliform Bacteria (N/100 ml)	5.71	11.03	Removing from	m Permit	401 KAR 5:080, Section 1(2)(c)2
Ammonia Nitrogen (as mg/l N)	1.14	1.29	20	30	401 KAR 10:031, Section 4
Dissolved Oxygen (mg/l) (minimum)	6.7	N/A	Not less than	n 2.0	401 KAR 10:031, Section 4 401 KAR 5:045, Sections 3 and 5
pH (standard units)	6.8	8.0	6.0 (min)	9.0 (max)	401 KAR 10:031, Section 4 401 KAR 5:045, Section 4

The data contained under the reported discharge columns is not from the renewal application, but rather from the analysis of the DMR data that has been reported during the term of the previous permit.

The abbreviation BOD_5 means Biochemical Oxygen Demand (5-day).

The abbreviations N/R and N/A mean not reported on the Discharge Monitoring Report (DMR) and not applicable, respectively.

The effluent limitations for BOD_5 and Total Suspended Solids are Monthly Averages and Weekly Averages.

The effluent limitations for Escherichia Coli are 30 day and 7 day Geometric Means.

The data contained under the reported discharge columns is from the analysis of the Discharge Monitoring Reports (DMRs) data that has been reported during the term of the current permit.

6 METHODOLOGY USED IN DETERMINING LIMITATIONS

a. Serial Number

Outfall 002 - Internal monitoring point for the sanitary wastewaters prior to discharge through Outfall 001.

b. Effluent Characteristics

Flow
Total Suspended Solids
Dissolved Oxygen
Ammonia Nitrogen

Biochemical Oxygen Demand (5-day) Escherichia Coli pH Fecal Coliform Bacteria

c. Pertinent Factors

On September 8, 2004 Kentucky's revised water quality standards, 401 KAR 10:031 became effective.

d. Monitoring Requirements

Flow shall be monitored instantaneously once per month.

Ammonia Nitrogen, Biochemical Oxygen Demand (5-day), Total Suspended Solids, *Escherichia Coli*, pH, Dissolved Oxygen and Total Residual Chlorine shall be monitored once per month by grab sample.

e. Justification of Limits

The Kentucky Administrative Regulations (KARs) cited below have been duly promulgated pursuant to the requirements of Chapter 224 of the Kentucky Revised Statutes (KRSs).

Internal Monitoring Requirement

Section 3(8) of 401 KAR 5:065 authorizes the establishment of internal monitoring points to ensure compliance with applicable treatment requirements, which when commingling with other wastestreams will prevent measuring compliance.

Escherichia Coli and Fecal Coliform Bacteria

The limits for *Escherichia Coli* are consistent with the requirements of 401 KAR 10:031, Section 7, 401 KAR 5:045 Section 4 and 401 KAR 5:080, Section 1(2)(c) 2. Although Fecal Coliform Bacteria has been used as an indicator of fecal contamination, it does contain other species that are not necessarily fecal in origin. EPA recommends *Escherichia Coli*, which is specific to fecal material from warm-blooded animals, as the best indicator of health risk from contact with recreational waters. Therefore, it is the "Best Professional Judgment "BPJ" of the Division of Water that *Escherichia Coli* be used in place of Fecal Coliform Bacteria on this permit.

Flow

The monitoring requirements for this parameter are consistent with the requirements of 401 KAR 5:065, Section 2(8).

$\underline{BOD_{5}}$, Ammonia Nitrogen, and Dissolved Oxygen

The limits for these parameters are consistent with the requirements of 401 KAR 10:031, Section 4, and 401 KAR 5:045, Sections 3 and 5. Section 4 of 10:031 establishes water quality criteria for the protection of Kentucky's waters.

6 METHODOLOGY USED IN DETERMINING LIMITATIONS - continued

e. Justification of Limits - continued

Total Suspended Solids

The limits for this parameter are consistent with the requirements of 401 KAR 10:031, Section 4 and 5:045, Sections 2 and 3. Section 4 of 10:031 establishes water quality criteria for the protection of Kentucky's waters. Sections 2 and 3 of 5:045 require biochemically degradable wastewaters to receive secondary treatment.

рН

The limits for these parameters are consistent with the requirements of 401 KAR 10:031, Section 4 and 5:045, Section 4. Section 4 of 10:031 establishes water quality criteria for the protection of Kentucky's waters. Section 4 of 5:045 establishes the acceptable levels of these parameters for biochemically degradable wastewaters.



7. REPORTED DISCHARGE AND PROPOSED LIMITS

Description of Discharge - Outfall 003 - No treatment of stormwater runoff.

Effluent Characteristics	Reported D: Monthly Average	ischarge Daily Maximum	Proposed Monthly Average	Limits Daily Maximum	Applicable Water Quality Criteria and/or Effluent Guidelines
Flow (MGD)	0.30	1.28	Report	Report	401 KAR 5:065, Section 2(8)
Precipitation (inches)	0.14	1.27	Report	Report	401 KAR 5:065, Section 2(8)
Hardness (as mg/l CaCO ₃)	105	105	Report	Report	401 KAR 5:065, Section 2(8)
Total Suspended Solids (mg/l)	16.5	17.1	Report	Report	401 KAR 5:065, Section 2(8)
Oil & Grease (mg/l)	5.3	5.3	Report	Report	401 KAR 5:065, Section 2(8)
Total Recoverable Metals (mg/l)	0.07	0.08	Report	Report	401 KAR 5:065, Section 2(8)
pH (standard units)	6.7	8.0	Report	Report	401 KAR 5:065, Section 2(8)

The term Total Recoverable Metals means those metals listed on Form C, Section V, Part C - Metals, Cyanide, and Total Phenols: Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc.

The data contained under the reported discharge columns is from the analysis of the Discharge Monitoring Reports (DMRs) data that has been reported during the term of the current permit.

8 METHODOLOGY USED IN DETERMINING LIMITATIONS

a. Serial Number

Outfall 003 - No treatment of stormwater runoff.

b. Effluent Characteristics

Flow Hardness Oil & Grease Total Recoverable Metals Precipitation Total Suspended Solids pH

c. Pertinent Factors

None

d. Monitoring Requirements

Flow shall be monitored instantaneously once per month.

Precipitation, Hardness, Total Suspended Solids, Oil & Grease, and pH shall be monitored once per month by grab sample.

Total Recoverable Metals shall be monitored once per quarter by grab sample. The results of the analyses shall be total and reported as a single concentration on the DMR. The laboratory bench sheets showing the results for each metal shall be attached to the DMR.

e. Justification of Conditions

The Kentucky regulations cited below have been duly promulgated pursuant to the requirements of Chapter 224 of the Kentucky Revised Statutes.

Flow, Precipitation, Hardness, Total Suspended Solids, Oil & Grease, pH, and Total Recoverable Metals

The monitoring requirements for these parameters are consistent with the requirements of 401 KAR 5:065, Section 2(8).

9. ANTIDEGRADATION

The development of this permit commenced prior to the April 12, 2005 EPA approval of Kentucky's Antidegradation Regulation promulgated on September 8, 2004. Therefore, previous antidegradation requirements are applicable. The conditions of 401 KAR 10:029, Section 1 have been satisfied by this permit action. A review under 401 KAR 10:030 Section 1 is not applicable.

10. PROPOSED COMPLIANCE SCHEDULE FOR ATTAINING EFFLUENT LIMITATIONS

Permittee shall comply with the effluent limitations by the effective date of the permit.

11. PROPOSED SPECIAL CONDITIONS WHICH WILL HAVE A SIGNIFICANT IMPACT ON THE DISCHARGE

Best Management Practices (BMP) Plan

Pursuant to 401 KAR 5:065, Section 2(10), a BMP requirement shall be included: to control or abate the discharge of pollutants from ancillary areas containing toxic or hazardous substances or those substances which could result in an environmental emergency; where numeric effluent limitations are infeasible; or to carry out the purposes and intent of KRS 224. The facility has several areas where support activities occur which have a potential of the discharge of such substances through storm water runoff or spillage. Some of these areas will drain to present wastewater treatment plants, others will not.

11. PROPOSED SPECIAL CONDITIONS WHICH WILL HAVE A SIGNIFICANT IMPACT ON THE DISCHARGE - continued

Cooling Water Additives, FIFRA, and Mollusk Control

The discharge of any product registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) in cooling water which ultimately may be released to the waters of the Commonwealth is prohibited, except Herbicides, unless specifically identified and authorized by the KPDES permit. In the event the permittee needs to use a biocide or chemical not previously reported for mollusk control or other purpose, the permittee shall submit sufficient information, a minimum of thirty (30) days prior to the commencement of use of said biocides or chemicals, to the Division of Water for review and establishment of appropriate control parameters. Such information requirements shall include:

- Name and general composition of biocide or chemical,
- 2. Any and all aquatic organism toxicity data,
- 3. Quantities to be used,
- 4. Frequencies of use,
- 5. Proposed discharge concentrations, and
- 6. EPA registration number, if applicable.

Outfall Signage

As a member of ORSANCO (Ohio River Valley Sanitation Commission) the Commonwealth of Kentucky through the Division of Water implements a requirement that the permittee post a permanent marker at each discharge point to the Ohio River. It is the Best Professional Judgment of the Division of Water, 401 KAR 5:080, Section 1(2)(c)2, that all permittees post a marker at all discharge locations and/or monitoring points. The ORSANCO requirements for the marker specify it to be at least 2 feet by 2 feet in size and a minimum of 3 feet above ground level with the Permittee Name and KPDES permit and outfall numbers in 2 inch letters. For internal monitoring points the marker shall be of sufficient size to include the outfall number in 2 inch letters and is to be posted as near as possible to the actual sampling location.

Mixing Zone

Gerdau Ameristeel has requested a mixing zone in the vicinity of the proposed discharge for Toxicity and Temperature. Pursuant to the requirements of 401 KAR 10:029, Section 4(6) an assigned mixing zone can not exceed 1/3 of the width of the receiving water body in a spatial direction. At the proposed point of discharge the width of the Tennessee River is 1640 feet (500 meters) therefore an assigned mixing zone for these pollutants can not exceed 400 feet in a spatial direction. In accordance with the requirements of 401 KAR 10:029, Section 4(1) the mixing zones shall have the following dimensions:

Toxicity:

Linear Distance from Point of Discharge: 0.033 feet in any direction Maximum Surface Area Involved: 8.56x10⁻⁴ square feet Volume of Receiving Water: 500 cfs (323 MGD)

Temperature:

Linear Distance from Point of Discharge:0.0056 feet in any directionMaximum Surface Area Involved: $2.47x10^{-5}$ square feetVolume of Receiving Water:500 cfs (323 MGD)

12. PERMIT DURATION

Five (5) years. This facility is in the Four Rivers, Upper & Lower Cumberland Unit as per the Kentucky Watershed Management Framework.

13. PERMIT INFORMATION

The application, draft permit fact sheet, public notice, comments received, and additional information is available by writing the Division of Water at 200 Fair Oaks Lane, Frankfort, Kentucky 40601.

14. REFERENCES AND CITED DOCUMENTS

All material and documents referenced or cited in this fact sheet are, a part of the permit information as described above and are readily available at the Division of Water Central Office. Information regarding these materials may be obtained from the person listed below.

15. CONTACT

For further information contact the individual identified on the Public Notice or the Permit Writer - Sara Beard at (502) 564-3410, extension 4925 or e-mail Sara.Beard@ky.gov.

16. PUBLIC NOTICE INFORMATION

Please refer to the attached Public Notice for details regarding the procedures for a final permit decision, deadline for comments, and other information required by 401 KAR 5:075, Section 4(2)(e).



PERMIT No.: KY0072231 Fact Sheet Attachment A

Page A-1

ATTACHMENT A - REGULATORY REQUIREMENTS

EFFLUENT GUIDELINES

The facility is a "New Source" subject to the requirements of Subpart G of 40 CFR Part 420 - Iron and Steel Manufacturing Point Source Category. Specifically, the "New Source Performance Standards" (NSPS) for the Hot strip and sheet mills, carbon and specialty Subsection of the Flat mills Section of the Hot Forming Subcategory (40 CFR 420.74).

PART 420 - IRON AND STEEL MANUFACTURING POINT SOURCE CATEGORY

Subpart G - Hot Forming Subcategory

Subsection 420.70 - Applicability; description of the hot forming subcategory

The provisions of this subpart are applicable to discharges and to the introduction of pollutants into publicly owned treatment works resulting from hot forming operations conducted in primary, section, flat, and pipe and tube mills

Subsection 420.74 - New Source Performance Standards (NSPS)

The discharge of wastewater pollutants from any new source subject to this subpart shall not exceed the standards set forth below.

(c) Flat mills - (1) Hot strip and sheet mills, carbon and specialty.

Subpart G

		NSPS effluent limitations			
Pol	lutant or pollutant property	Maximum for any 1 day	Average of daily values for 30 consecutive days		
		Kg/kkg	(pounds per 1,000 lb) of products		
TSS		0.0435	0.0163		
O&G		0.0109			
Нq		Within th	ne range of 6.0 to 9.0 at all times		

401 KAR 5:045, Section 3 - Secondary Treatment - for Sanitary Wastewaters (internal Outfall 002) that discharge at Outfall 001

Pollutant or Pollutant Characteristic	Maximum Concentration (mg/l)	Average Concentration (mg/l)
Total Suspended Solids	45	30

401 KAR 5:080, SECTION 1(2)(c)2 - Best Professional Jugement - for loadings in Storm Water Runoff and Filter Back Water that discharge at Outfall 001

Pollutant or Pollutant Characteristic	Maximum Loading (lbs/day)	Average Loading (lbs/day)
Total Suspended Solids	10	5

PERMIT No.: KY0072231 Fact Sheet Attachment A

Page A-2

Limits Calculation

EFFLUENT GUIDELINES

The final effluent limitations required by the effluent guidelines are a summation of the component contributions.

The following formulas where used to calculate the contribution from each source:

Monthly Average = \sum [(Production Rate) x (Monthly Average Factor)]

Daily Maximum = \sum [(Production Rate) x (Daily Maximum Factor)]

The following tables are a summarization of these calculations.

	40 CFR 420.74 - NSPS - Hot Forming (1,870.864*10 ³ lbs/day)			
Pollutant or pollutant property	Daily Maximum (lbs/day)	Monthly Average (lbs/day)		
Total Suspended Solids	81.383	30.495		
Oil & Grease	20.392	N/A		

SECONDARY TREATMENT

Sanitary Wastewater Component:

Monthly Average = Design Flow (MGD) \times 8.345 \times Secondary Treatment Monthly Average (mg/l) Daily Maximum = Design Flow (MGD) \times 8.345 \times Secondary Treatment Daily Maximum (mg/l)

Design Flow = 0.007 MGD

Pollutant or Pollutant Characteristic	Maximum Concentration (lbs/day)	Average Concentration (lbs/day)
Total Suspended Solids	2.6	1.8

BEST PROFESSIONAL JUGEMENT

Pollutant or Pollutant Characteristic	Maximum Concentration (lbs/day)	Average Concentration (lbs/day)
Total Suspended Solids	10	5

TOTAL LIMITS - Outfall 001

	Total Limits - 001			
Pollutant or pollutant property	Daily Maximum (lbs/day)	Monthly Average (lbs/day)		
Total Suspended Solids	94.0	37.3		
Oil & Grease	20.4	N/A		

Page B-1

ATTACHMENT B CORMIX Diffuser Model - Toxicity

CORMIX2 PREDICTION FILE:

CORMIX MIXING ZONE EXPERT SYSTEM Subsystem CORMIX2: Multiport Diffuser Discharges

CORMIX Version 5.0GT HYDRO2 Version 5.0.0.0 March 2007

HIDROZ VEISION 5.0.0.0 March 2007
CASE DESCRIPTION Site name/label: Gerdau Ameristeel KY0072231 Design case: Outfall 001 Toxicity FILE NAME: C:\Files\CORMIX 5.0_TEST\MyFiles\Gerdau toxicity.prd Time stamp: Tue Jun 9 10:31:01 2009
ENVIRONMENT PARAMETERS (metric units) Bounded section BS = 500.00 AS = 1760.00 QA = 161.92 ICHREG= 1 HA = 3.52 HD = 4.57 UA = 0.092 F = 0.046 USTAR = 0.7009E-02 UW = 2.000 UWSTAR=0.2198E-02 Uniform density environment STRCND= U RHOAM = 997.0456
DIFFUSER DISCHARGE PARAMETERS (metric units)
Diffuser type: DITYPE= unidirectional_perpendicular BANK = LEFT DISTB = 6.09 YB1 = 3.05 YB2 = 9.14 LD = 6.10 NOPEN = 3 SPAC = 3.05
D0 = 0.050 A0 = 0.002 H0 = 3.05 SUB0 = 1.52 Nozzle/port arrangement: unidirectional_without_fanning
GAMMA = 90.00 THETA = 0.00 SIGMA = 0.00 BETA = 90.00 U0 = 0.751 Q0 = 0.004 = 0.4425E-02 RHO0 = 995.3405 DRHOO = 0.1705E+01 GPO = 0.1677E-01 C0 = 0.5190E+01 CUNITS= TUa IPOLL = 1 KS = 0.0000E+00 KD = 0.0000E+00
FLUX VARIABLES - PER UNIT DIFFUSER LENGTH (metric units) q0 =0.7254E-03 m0 =0.5450E-03 j0 =0.1217E-04 SIGNJ0= 1.0 Associated 2-d length scales (meters) lQ=B = 0.001 lM = 1.03 lm = 0.06 lmp = 99999.00 lbp = 99999.00 la = 99999.00
FLUX VARIABLES - ENTIRE DIFFUSER (metric units) Q0 = 0.4425E-02 M0 = 0.3324E-02 J0 = 0.7421E-04 Associated 3-d length scales (meters) LQ = 0.04 LM = 1.61 Lm = 0.63 Lb = 0.10 Lmp = 99999.00 Lbp = 99999.00
NON-DIMENSIONAL PARAMETERS FR0 = 186.67 FRD0 = 25.94 R = 8.17 PL = 140. (slot) (port/nozzle)
RECOMPUTED SOURCE CONDITIONS FOR RISER GROUPS: Properties of riser group with 1 ports/nozzles each: U0 = 0.751 D0 = 0.050 A0 = 0.002 THETA = 0.00 FR0 = 186.67 FRD0 = 25.94 R = 8.17 (slot) (riser group)
FLOW CLASSIFICATION 22222222222222222222222222222222222

2

CORMIX2 PREDICTION FILE:

MIXING ZONE / TOXIC DILUTION / REGION OF INTEREST PARAMETERS CO =0.5190E+01 CUNITS= TUa XINT = 5000.00 XMAX = 5000.00X-Y-Z COORDINATE SYSTEM: ORIGIN is located at the bottom and the diffuser mid-point: 6.09 m from the LEFT bank/shore. X-axis points downstream, Y-axis points to left, Z-axis points upward. NSTEP = 800 display intervals per module -----BEGIN MOD201: DIFFUSER DISCHARGE MODULE Due to complex near-field motions: EQUIVALENT SLOT DIFFUSER (2-D) GEOMETRY Profile definitions: BV = Gaussian 1/e (37%) half-width, in vertical plane normal to trajectory BH = top-hat half-width, in horizontal plane normal to trajectory S = hydrodynamic centerline dilution C = centerline concentration (includes reaction effects, if any) X Y Z S C BV 0.00 0.00 3.05 1.0 0.519E+01 0.00 END OF MOD201: DIFFUSER DISCHARGE MODULE _____ BEGIN MOD271: ACCELERATION ZONE OF UNIDIRECTIONAL CO-FLOWING DIFFUSER In this laterally contracting zone the diffuser plume becomes VERTICALLY FULLY MIXED over the entire layer depth (HS = 4.57m). Full mixing is achieved after a plume distance of about five layer depths from the diffuser. Profile definitions: BV = layer depth (vertically mixed) BH = top-hat half-width, in horizontal plane normal to trajectory S = hydrodynamic average (bulk) dilution C = average (bulk) concentration (includes reaction effects, if any) X Y Z S C BV BH 0.00 0.00 3.05 1.0 0.519E+01 0.00 3.05 ** CMC HAS BEEN FOUND ** The pollutant concentration in the plume falls below CMC value of 0.100E+01 in the current prediction interval. This is the extent of the TOXIC DILUTION ZONE. ** WATER QUALITY STANDARD OR CCC HAS BEEN FOUND ** The pollutant concentration in the plume falls below water quality standard or CCC value of 0.100E+01 in the current prediction interval. This is the spatial extent of concentrations exceeding the water quality standard or CCC value.
 0.00
 0.00
 3.05
 21.6 0.240E+00
 0.01
 3.05

 0.01
 0.00
 3.05
 30.1 0.172E+00
 0.01
 3.05

 0.01
 0.00
 3.04
 36.7 0.141E+00
 0.02
 3.05

•

PERMIT No.: KY0072231 Fact Sheet Attachment B

Page B-3

CORMIX2 PREDICTION FILE:

3.04	0.00	2.29	582.9 0.890E-02	4.56	3.03
3.05	0.00	2.29	583.3 0.890E-02	4.56	3.03
3.05	0.00	2.28	583.6 0.889E-02	4.57	3.03

Cumulative travel time = 32.6947 sec

Plume centerline may exhibit slight discontinuities in transition to subsequent far-field module.

END OF MOD271: ACCELERATION ZONE OF UNIDIRECTIONAL CO-FLOWING DIFFUSER

BEGIN MOD251: DIFFUSER PLUME IN CO-FLOW

Phase 1: Vertically mixed, Phase 2: Re-stratified

Phase 2: The flow has RESTRATIFIED at the beginning of this zone.

This flow region is INSIGNIFICANT in spatial extent and will be by-passed.

END OF MOD251: DIFFUSER PLUME IN CO-FLOW

** End of NEAR-FIELD REGION (NFR) **

BEGIN MOD241: BUOYANT AMBIENT SPREADING

Profile definitions:

BV = top-hat thickness, measured vertically

BH = top-hat half-width, measured horizontally in y-direction

ZU = upper plume boundary (Z-coordinate)

ZL = lower plume boundary (Z-coordinate)

S = hydrodynamic average (bulk) dilution

C = average (bulk) concentration (includes reaction effects, if any)

Plume Stage 1 (not bank attached):

	X	Y	Z	S	C	BV	BH	ZU	$z_{ m L}$
	3.05	0.00	4.57	583.6	0.889E-02	4.57	3.07	4.57	0.00
	3.10	0.00	4.57	583.9	0.889E-02	4.57	3.08	4.57	0.00
	3.16	0.00	4.57	584.2	0.888E-02	4.56	3.08	4.57	0.01
			1						
			-						
•									
	45.59	0.00	4.57	785.5	0.661E-02	3.10	6.09	4.57	1.47
	45.64	0.00	4.57	785.8	0.661E-02	3.10	6.09	4.57	1.47
	45.69	0.00	4.57	786.0	0.660E-02	3.10	6.10	4.57	1.47
Cumi	ılative	travel tim	ne =	49	6.1814 sec				

Plume is ATTACHED to LEFT bank/shore.

Plume width is now determined from LEFT bank/shore.

Plume Stag	se 2 (bank	attache	ed):					
X	Y	Z	S	С	BV	BH	ZU	ZL
45.69	6.09	4.57	786.0	0.660E-02	3.10	12.19	4.57	1.47
45.81	6.09	4.57	786.5	0.660E-02	3.10	12.20	4.57	1.47
45.92	6.09	4.57	787.0	0.659E-02	3.10	12.21	4.57	1.47
•								
•								
137.18	6.09	4.57	1322.9	0.392E-02	3.75	16.96	4.57	0.82
137.29	6.09	4.57	1323.8	0.392E-02	3.75	16.97	4.57	0.82
137.41	6.09	4.57	1324.7	0.392E-02	3.75	16.97	4.57	0.82
Cumulative	travel t	ime =	149	93 0807 sec				

PERMIT No.: KY0072231 Fact Sheet Attachment B

Page B-4

CORMIX2 PREDICTION FILE:

END OF MOD241: BUOYANT AMBIENT SPREADING

Due to the attachment or proximity of the plume tothe bottom, the bottom coordinate for the FAR-FIELD differs from the ambient depth, ZFB = 0 m. In a subsequent analysis set "depth at discharge" equal to "ambient depth".

BEGIN MOD261: PASSIVE AMBIENT MIXING IN UNIFORM AMBIENT

Vertical diffusivity (initial value) = $0.647E-02 \text{ m}^2/\text{s}$ Horizontal diffusivity (initial value) = $0.809E-02 \text{ m}^2/\text{s}$

Profile definitions:

- BV = Gaussian s.d.*sqrt(pi/2) (46%) thickness, measured vertically
 - = or equal to layer depth, if fully mixed
- BH = Gaussian s.d.*sqrt(pi/2) (46%) half-width,
 - measured horizontally in Y-direction
- ZU = upper plume boundary (Z-coordinate)
- ZL = lower plume boundary (Z-coordinate)
- S = hydrodynamic centerline dilution
- C = centerline concentration (includes reaction effects, if any)

Plume	Stage	2	(bank	attached;):

	X	Y	Z	S	C	BV	BH	ZU	ZL
	137.41	6.09	4.57	1324.7	0.392E-02	3.75	16.97	4.57	0.82
	143.49	6.09	4.57	1365.0	0.380E-02	3.86	17.02	4.57	0.71
	149.57	6.09	4.57	1405.5	0.369E-02	3.96	17.07	4.57	0.61
	155.64	6.09	4.57	1446.1	0.359E-02	4.06	17.12	4.57	0.51
	161.72	6.09	4.57	1486.8	0.349E-02	4.16	17.17	4.57	0.41
	167.80	6.09	4.57	1527.5	0.340E-02	4.27	17.22	4.57	0.30
	173.88	6.09	4.57	1568.3	0.331E-02	4.37	17.27	4.57	0.20
	179.96	6.09	4.57	1609.0	0.323E-02	4.47	17.32	4.57	0.10
	186.03	6.09	4.57	1649.7	0.315E-02	4.57	17.37	4.57	0.00
_									

Plume interacts with BOTTOM.

The passive diffusion plume becomes VERTICALLY FULLY MIXED within this prediction interval.

192.11	6.09	4.57	1654.6 0.314E-02	4.57	17.41	4.57	0.00
198.19	6.09	4.57	1659.2 0.313E-02	4.57	17.46	4.57	0.00
204.27	6.09	4.57	1663.8 0.312E-02	4.57	17.51	4.57	0.00

.

•	4						
4987.79	6.09	4.57	3834.5 0.135E-02	4.57	40.36	4.57	0.00
4993.87	6.09	4.57	3836.5 0.135E-02	4.57	40.38	4.57	0.00
4999.95	6.09	4.57	3838.4 0.135E-02	4.57	40.40	4.57	0.00
Q1 - +			E 424E 006E				

Cumulative travel time = 54345.8867 sec

Simulation limit based on maximum specified distance = 5000.00 m. This is the REGION OF INTEREST limitation.

END OF MOD261: PASSIVE AMBIENT MIXING IN UNIFORM AMBIENT

PERMIT No.: KY0072231 Fact Sheet Attachment B Page B-5

CORMIX2 SESSION REPORT:

CORMIX MIXING ZONE EXPERT SYSTEM

CORMIX Version 5.0GT HYDRO2: Version March, 2007

SITE NAME/LABEL: Gerdau Ameristeel KY0072231

DESIGN CASE: Outfall 001 Toxicity

FILE NAME: C:\Program Files\CORMIX 5.0 TEST\MyFiles\Gerdau

toxicity.prd

Using subsystem CORMIX2: Multiport Diffuser Discharges

Start of session: 06/09/2009--10:31:01

SUMMARY OF INPUT DATA:

```
_____
AMBIENT PARAMETERS:
  Cross-section
                                               = bounded
  Width
                                       BS
                                              = 500 \text{ m}
  Channel regularity
                                      ICHREG = 1
  Ambient flowrate
                                      QA = 161.92 \text{ m}^3/\text{s}
                                              = 3.52 m
  Average depth
                                      HA
                                           = 4.57 \text{ m}
  Depth at discharge
                                      ^{\mathrm{HD}}
                                             = 0.092 \text{ m/s}
  Ambient velocity
                                       UA
                                              = 0.0464
  Darcy-Weisbach friction factor
                                       F
    Calculated from Manning's n
                                              = 0.03
                                       UW
                                              = 2 \text{ m/s}
  Wind velocity
  Stratification Type
                                       STRCND = U
  Surface temperature
                                             = 25 degC
  Bottom temperature
                                              = 25 \text{ degC}
  Calculated FRESH-WATER DENSITY values:
  Surface density
                                       RHOAS = 997.0456 \text{ kg/m}^3
                                       RHOAB = 997.0456 \text{ kg/m}^3
  Bottom density
_____
DISCHARGE PARAMETERS:
                                       Submerged Multiport Diffuser Discharge
  Diffuser type
                                       DITYPE = unidirectional perpendicular
  Diffuser length
                                       LD = 6.1 m
= left
  Nearest bank
                                       YB1 = 3.05 \text{ m}; \qquad YB2 = 9.14 \text{ m}
  Diffuser endpoints
  Number of openings
                                       NOPEN = 3
  Number of Risers
                                       NRISER = 3
  Ports/Nozzles per Riser
                                      NPPERR = 1
  Spacing between risers/openings SPAC = 3.05 m
  Port/Nozzle diameter
                                      D0
                                            = 0.05 m
    with contraction ratio
                                              = 1
  Equivalent slot width
                                             = 0.0010 \text{ m}
                                      B0
                                      TA0 = 0.0059 \text{ m}^2
  Total area of openings
                                     \begin{array}{rcl} & 0.035 & \text{m} & \text{m} & \text{m} \\ \text{U0} & = 0.75 & \text{m/s} \\ \text{Q0} & = 0.004425 & \text{m}^3/\text{s} \\ \text{H0} & = 3.05 & \text{m} \end{array}
  Discharge velocity
  Total discharge flowrate
  Discharge port height
                                      BETYPE = unidirectional without fanning
  Nozzle arrangement
                                     GAMMA = 90 deg
  Diffuser alignment angle
  Vertical discharge angle THETA = 0 deg
  Actual Vertical discharge angle THEAC = 0 deg
  Horizontal discharge angle SIGMA = 0 deg Relative orientation angle BETA = 90 deg
                                             = 31 degC
  Discharge temperature (freshwater)
  Corresponding density RHOO = 995.3405 \text{ kg/m}^3
                                     DRHO = 1.7051 \text{ kg/m}^3
  Density difference
 Buoyant acceleration

Discharge concentration

Surface heat exchange coeff.

KS = 0 m/s

KD = 0 /s
                                     GP0 = 0.0168 \text{ m/s}^2

C0 = 5.19 \text{ TUa}
                                             = 0 \text{ m/s}
```

PERMIT No.: KY0072231
Fact Sheet Attachment B

Page B-6

CORMIX2 SESSION REPORT:

```
FLUX VARIABLES PER UNIT DIFFUSER LENGTH:
 Discharge (volume flux) q0 = 0.000725 \text{ m}^2/\text{s}

Momentum flux m0 = 0.000545 \text{ m}^3/\text{s}^2

Buoyancy flux j0 = 0.000012 \text{ m}^3/\text{s}^3
DISCHARGE/ENVIRONMENT LENGTH SCALES:
 LQ = 0.00 \text{ m} Lm = 0.06 \text{ m} LM = 1.03 \text{ m} lm' = 99999 \text{ m} Lb' = 99999 \text{ m} La = 99999 \text{ m}
 (These refer to the actual discharge/environment length scales.)
NON-DIMENSIONAL PARAMETERS:
                            FR0 = 186.67
Slot Froude number
 Port/nozzle Froude number FRD0 = 25.94
Velocity ratio R = 8.17
                              R = 8.17
MIXING ZONE / TOXIC DILUTION ZONE / AREA OF INTEREST PARAMETERS:
 Toxic discharge
                                      = yes
 CMC concentration CMC = 1 TUa

CCC concentration CCC = 1 TUa

Water quality standard specified = given by CCC value

Regulatory mixing zone = no
 Regulatory mixing zone
                                     = 5000 m downstream
 Region of interest
*******************
HYDRODYNAMIC CLASSIFICATION:
  *____*
  | FLOW CLASS = IMPU7 |
  *----*
 This flow configuration applies to a layer corresponding to the full water
 depth at the discharge site.
 Applicable layer depth = water depth = 4.57 m
*******************
MIXING ZONE EVALUATION (hydrodynamic and regulatory summary):
X-Y-Z Coordinate system:
 Origin is located at the bottom below the port center:
   6.09 m from the left bank/shore.
 Number of display steps NSTEP = 800 per module.
______
NEAR-FIELD REGION (NFR) CONDITIONS :
Note: The NFR is the zone of strong initial mixing. It has no regulatory
  implication. However, this information may be useful for the discharge
 designer because the mixing in the NFR is usually sensitive to the
 discharge design conditions.
 Pollutant concentration at NFR edge c = 0.0089 TUa
 Dilution at edge of NFR
                                   s = 583.6
 NFR Location:
                                   x = 3.05 m
                                   y = 0 m
    (centerline coordinates)
                                    z = 4.57 \text{ m}
 NFR plume dimensions: half-width (bh) = 3.03 \text{ m}
                       thickness (bv) = 4.57 \text{ m}
Cumulative travel time: 32.695 sec.
______
Buovancy assessment:
 The effluent density is less than the surrounding ambient water
 density at the discharge level.
 Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards
 the surface.
```

PERMIT No.: KY0072231 Fact Sheet Attachment B Page B-7

CORMIX2 SESSION REPORT:

```
Near-field instability behavior:
 The diffuser flow will experience instabilities with full vertical mixing
  in the near-field.
 There may be benthic impact of high pollutant concentrations.
FAR-FIELD MIXING SUMMARY:
 Plume is vertically fully mixed WITHIN NEAR-FIELD (or a fraction thereof),
 but RE-STRATIFIES LATER.
 Plume becomes vertically fully mixed again at 192.11 m downstream.
 .__________
PLUME BANK CONTACT SUMMARY:
 Plume in bounded section contacts one bank only at 45.69 m downstream.
******************** TOXIC DILUTION ZONE SUMMARY ****************
Recall: The TDZ corresponds to the three (3) criteria issued in the USEPA
 Technical Support Document (TSD) for Water Quality-based Toxics Control,
 1991 (EPA/505/2-90-001).
 Criterion maximum concentration (CMC) = 1 TUa
Corresponding dilution
                                     = 5.19
The CMC was encountered at the following plume position:
 Plume location:
                                   x = 0.00 m
   (centerline coordinates)
                                    y = 0 m
                                    z = 3.05 \text{ m}
                      half-width (bh) = 3.05 m
 Plume dimension:
                       thickness (bv) = 0.01 m
CRITERION 1: This location is beyond 50 times the discharge length scale of
            Lq = 0.04 m.
 +++++ The discharge length scale TEST for the TDZ has FAILED. +++++
CRITERION 2: This location is within 5 times the ambient water depth of
            HD = 4.57 \text{ m}.
 +++++++ The ambient depth TEST for the TDZ has been SATISFIED.+++++++++
CRITERION 3: No RMZ has been defined. Therefore, the Regulatory Mixing zone
            test for the TDZ cannot be applied.
The diffuser discharge velocity is equal to 0.75 \ \text{m/s}.
  This is below the value of 3.0 m/s recommended in the TSD.
 *** This discharge DOES NOT SATISFY all three CMC criteria for the TDZ. ****
 **** This MAY be caused by the low discharge velocity for this design. *****
No RMZ has been specified.
The CCC was encountered at the following plume position:
The CCC for the toxic pollutant was encountered at the following
 plume position:
                                     = 1 TUa
Corresponding dilution
                                     = 5.2
 Plume location:
                                   x = 0.00 m
                                    y = 0 m
    (centerline coordinates)
                                    z = 3.05 m
                      half-width (bh) = 3.05 m
 Plume dimensions:
                       thickness (bv) = 0.01 \text{ m}
CORMIX2 uses the TWO-DIMENSIONAL SLOT DIFFUSER CONCEPT to represent
 the actual three-dimensional diffuser geometry. Thus, it approximates
 the details of the merging process of the individual jets from each
 port/nozzle.
In the present design, the spacing between adjacent ports/nozzles
 (or riser assemblies) is of the order of, or less than, the local
```

water depth so that the slot diffuser approximation holds well.

PERMIT No.: KY0072231 Fact Sheet Attachment B Page B-8

CORMIX2 SESSION REPORT:

Nevertheless, if this is a final design, the user is advised to use a final CORMIX1 (single port discharge) analysis, with discharge data for an individual diffuser jet/plume, in order to compare to the present near-field prediction.

REMINDER: The user must take note that HYDRODYNAMIC MODELING by any known technique is NOT AN EXACT SCIENCE.

Extensive comparison with field and laboratory data has shown that the CORMIX predictions on dilutions and concentrations (with associated plume geometries) are reliable for the majority of cases and are accurate to within about +-50% (standard deviation).

As a further safeguard, CORMIX will not give predictions whenever it judges the design configuration as highly complex and uncertain for prediction.



PERMIT No.: KY0072231 Fact Sheet Attachment C

Page C-1

ATTACHMENT C CORMIX Diffuser Model - Thermal

CORMIX2 PREDICTION FILE:

CORMIX MIXING ZONE EXPERT SYSTEM Subsystem CORMIX2: Multiport Diffuser Discharges CORMIX Version 5.0GT
HYDRO2 Version 5.0.0.0 March 2007

	HYDRO2 Version 5.	0.0.0 March 20	007		
FILE NAME: (Gerdau Ameristeel K Outfall 001 Thermal C:\ Files\CORMIX Wed Jun 10 13:49:03	5.0_TEST\MyF	iles\Gerdau	ı therr	mal.prd
UA = 0.092 M UW = 2.000 M Uniform density envi	AS = 1760.00 HD = 4.57 F = 0.046 UWSTAR=0.2198E-02	QA = 163 USTAR =0.70091	1.92 ICHRI E-02	EG= 1	
DIFFUSER DISCHARGE PAR Diffuser type: I BANK = LEFT I LD = 6.10 I DO = 0.050 A Nozzle/port arranger GAMMA = 90.00 I UO = 0.751 Q RHOO = 993.0346 I	DITYPE= unidirection DISTB = 6.09 NOPEN = 3 A0 = 0.002 ment: unidirection THETA = 0.00 Q0 = 0.004	mal_perpendict YB1 = SPAC = SPAC = Smal_without_fa SIGMA = SIGMA = 0.44251	3.05 YB2 3.05 3.05 SUB0 anning 0.00 BETA E-02	= = =	9.14 1.52 90.00
C0 = 0.3780E+02 0 IPOLL = 3	CUNITS= deg.C KS =0.0000E+00 UNIT DIFFUSER LENG m0 =0.5450E-03 th scales (meters)	TH (metric undig = 0.2862) lm = 0	E+00 its) E-04 SIGNA	J0=	1.0
FLUX VARIABLES - ENTI Q0 =0.4425E-02 M Associated 3-d lengt LQ = 0.04 I	M0 =0.3324E-02 th scales (meters) LM = 1.05	J0 =0.1746F	0.63 Lb	= = 99	0.22 9999.00
		R = 8	3.17 PL	=	140.
FR0 = 121.71 H		s/nozzles each	1: 0.002 THET <i>I</i> 3.17	<i>J</i> =	0.00

PERMIT No.: KY0072231 Fact Sheet Attachment C

Page C-2

CORMIX2 PREDICTION FILE:

FLOW CLASSIFICATION 2 Flow class (CORMIX2) = IMPU7 2 2 Applicable layer depth HS = 4.57 2 MIXING ZONE / TOXIC DILUTION / REGION OF INTEREST PARAMETERS C0 = 0.3780E + 02 CUNITS= deg.C NTOX = 0 NSTD = 1 REGMZ = 0CSTD = 0.3170E + 02XINT = 5000.00 XMAX = 5000.00X-Y-Z COORDINATE SYSTEM: ORIGIN is located at the bottom and the diffuser mid-point: 6.09 m from the LEFT bank/shore. X-axis points downstream, Y-axis points to left, Z-axis points upward. NSTEP = 800 display intervals per module NOTE on dilution/concentration values for this HEATED DISCHARGE (IPOLL=3): S = hydrodynamic dilutions, include buoyancy (heat) loss effects, but provided plume has surface contact C = corresponding temperature values (always in "degC"!), include heat loss, if any -----BEGIN MOD201: DIFFUSER DISCHARGE MODULE Due to complex near-field motions: EQUIVALENT SLOT DIFFUSER (2-D) GEOMETRY Profile definitions: BV = Gaussian 1/e (37%) half-width, in vertical plane normal to trajectory BH = top-hat half-width, in horizontal plane normal to trajectory S = hydrodynamic centerline dilution C = centerline concentration (includes reaction effects, if any) S С X BV 0.00 3.05 1.0 0.378E+02 0.00 0.00 END OF MOD201: DIFFUSER DISCHARGE MODULE BEGIN MOD271: ACCELERATION ZONE OF UNIDIRECTIONAL CO-FLOWING DIFFUSER In this laterally contracting zone the diffuser plume becomes VERTICALLY FULLY MIXED over the entire layer depth (HS = 4.57m). Full mixing is achieved after a plume distance of about five layer depths from the diffuser. Profile definitions: BV = layer depth (vertically mixed) BH = top-hat half-width, in horizontal plane normal to trajectory S = hydrodynamic average (bulk) dilution C = average (bulk) concentration (includes reaction effects, if any)

Page C-3

CORMIX2 PREDICTION FILE:

X 0.00 ** WATER QUAL The pollutan or CCC val This is the standard o	ITY STANDA t concentr ue of 0.31 spatial ex	3.05 RD OR Cation i 7E+02 i	1.0 0. CCC HAS B n the pl n the cu	378E+02 EEN FOUND ume falls rrent pre	0.00 ** below wa diction i	ter qual nterval.		
0.00 0.01	0.00 0.00 0.00	3.05	30.1 0.	125E+01	0.01	3.05 3.05 3.05		
3.05 3.05 Cumulative t Plume cent to subse	erline may quent far-	2.29 2.28 = = r exhibi field m	583.3 0. 583.6 0. 32. t slight	648E-01 648E-01 6947 sec disconti	4.56 4.57 nuities i			
END OF MOD271								
Phase 1: Ver Phase 2: The This flow re END OF MOD251 ** End of NEA	tically mi flow has gion is IN DIFFUSER R-FIELD RE	xed, Ph	TIFIED at CANT in IN CO-FL	e-stratif the begingspatial endow	nning of		by-pass	
	nitions: at thickne at half-wi plume bou	ess, mea dth, me andary (andary (rerage (sured ve asured h Z-coordi Z-coordi bulk) di	rtically orizontal nate) nate) lution				
Plume Stage X 3.05 3.08 3.12	Y 0.00 0.00	Z 4.57	S 583.6 0.583.9 0.584.1 0.	647E-01	BV 4.57 4.56 4.56	BH 3.07 3.08 3.08	ZU 4.57 4.57 4.57	ZL 0.00 0.01 0.01
30.81 30.85 30.88 Cumulative t	0.00	4.57 4.57	718.4 0. 718.5 0. 718.7 0. 335.	526E-01	2.84 2.84 2.83	6.09 6.09 6.10	4.57 4.57 4.57	1.73 1.73 1.74

PERMIT No.: KY0072231 Fact Sheet Attachment C

Page C-4

CORMIX2 PREDICTION FILE:

Plume is ATTACHED to LEFT bank/shore. Plume width is now determined from LEFT bank/shore. Plume Stage 2 (bank attached):

X Y Z S C BV BH ZU ZL

30.88 6.09 4.57 718.7 0.526E-01 2.83 12.19 4.57 1.74

31.36 6.09 4.57 720.0 0.525E-01 2.83 12.23 4.57 1.74

31.83 6.09 4.57 721.3 0.524E-01 2.83 12.28 4.57 1.74 12.22 408.89 6.09 4.57 3468.0 0.109E-01 4.57 34.89 4.57 0.00 409.36 6.09 4.57 3474.2 0.109E-01 4.57 34.92 4.57 0.00 409.84 6.09 4.57 3480.4 0.109E-01 4.57 34.94 4.57 0.00 mulative travel time = 4454.1870 sec Cumulative travel time = 4454.1870 sec END OF MOD241: BUOYANT AMBIENT SPREADING ------Due to the attachment or proximity of the plume tothe bottom, the bottom coordinate for the FAR-FIELD differs from the ambient depth, ZFB = 0 m. In a subsequent analysis set "depth at discharge" equal to "ambient depth". ______ BEGIN MOD261: PASSIVE AMBIENT MIXING IN UNIFORM AMBIENT Vertical diffusivity (initial value) = 0.647E-02 m^2/s Horizontal diffusivity (initial value) = 0.809E-02 m^2/s The passive diffusion plume is VERTICALLY FULLY MIXED at beginning of region. Profile definitions: BV = Gaussian s.d.*sqrt(pi/2) (46%) thickness, measured vertically = or equal to layer depth, if fully mixed BH = Gaussian s.d.*sqrt(pi/2) (46%) half-width, measured horizontally in Y-direction ZU = upper plume boundary (Z-coordinate) ZL = lower plume boundary (Z-coordinate) S = hydrodynamic centerline dilution C = centerline concentration (includes reaction effects, if any) Plume Stage 2 (bank attached): X Y Z S C BV BH ZU ZL 409.84 6.09 4.57 3480.4 0.109E-01 4.57 34.94 4.57 0.00 415.58 6.09 4.57 3482.6 0.109E-01 4.57 34.96 4.57 0.00 421.31 6.09 4.57 3484.9 0.108E-01 4.57 34.98 4.57 0.00

 4988.57
 6.09
 4.57
 4966.9
 0.761E-02
 4.57
 49.86
 4.57
 0.00

 4994.31
 6.09
 4.57
 4968.4
 0.761E-02
 4.57
 49.88
 4.57
 0.00

 5000.04
 6.09
 4.57
 4970.0
 0.761E-02
 4.57
 49.89
 4.57
 0.00

 Cumulative travel time = 54345.8867 sec Simulation limit based on maximum specified distance = 5000.00 m. This is the REGION OF INTEREST limitation. END OF MOD261: PASSIVE AMBIENT MIXING IN UNIFORM AMBIENT

PERMIT No.: KY0072231 Fact Sheet Attachment C

Page C-5

CORMIX2 SESSION REPORT:

CORMIX MIXING ZONE EXPERT SYSTEM CORMIX Version 5.0GT

HYDRO2: Version March, 2007

SITE NAME/LABEL: Gerdau Ameristeel KY0072231

DESIGN CASE: Outfall 001 Thermal

FILE NAME: C:\Program Files\CORMIX 5.0 TEST\MyFiles\Gerdau

thermal.prd

Using subsystem CORMIX2: Multiport Diffuser Discharges

Start of session: 06/10/2009--13:49:03

SUMMARY OF INPUT DATA:

```
AMBIENT PARAMETERS:
                                          = bounded
 Cross-section
 Width
                                   BS
                                          = 500 \text{ m}
                                   ICHREG = 1
 Channel regularity
 Ambient flowrate
                                           = 161.92 \text{ m}^3/\text{s}
                                  QA
                                  HA
                                          = 3.52 m
 Average depth
 Depth at discharge
                                        = 4.57 \text{ m}
                                   HD
 Ambient velocity
                                   UA
                                         = 0.092 \text{ m/s}
 Darcy-Weisbach friction factor F
                                         = 0.0464
   Calculated from Manning's n
                                         = 0.03
                                   TIW
 Wind velocity
                                         = 2 \text{ m/s}
 Stratification Type
                                   STRCND = U
 Surface temperature
                                          = 25 \text{ degC}
                                          = 25 degC
 Bottom temperature
 Calculated FRESH-WATER DENSITY values:
                                   RHOAS = 997.0456 \text{ kg/m}^3
  Surface density
                                   RHOAB = 997.0456 \text{ kg/m}^3
 Bottom density
                                   _____
DISCHARGE PARAMETERS:
                                   Submerged Multiport Diffuser Discharge
 Diffuser type
                                   DITYPE = unidirectional perpendicular
                                  LD = 0._
= left
3 05
 Diffuser length
                                        = 6.1 \text{ m}
 Nearest bank
                                   YB1
                                         = 3.05 \text{ m}; \quad \text{YB2} = 9.14 \text{ m}
 Diffuser endpoints
 Number of openings
                                   NOPEN = 3
 Number of Risers
                                   NRISER = 3
                                   NPPERR = 1
 Ports/Nozzles per Riser
  Spacing between risers/openings SPAC = 3.05 m
  Port/Nozzle diameter
                                   D0
                                        = 0.05 m
    with contraction ratio
                                         = 1
  Equivalent slot width
                                   в0
                                         = 0.0010 \text{ m}
                                   TA0 = 0.0059 \text{ m}^2
  Total area of openings
 Discharge velocity
                                   U0 = 0.75 \text{ m/s}
                                  Q0 = 0.004425 \text{ m}^3/\text{s}
H0 = 3.05 \text{ m}
 Total discharge flowrate
 Discharge port height
 Nozzle arrangement
                                  BETYPE = unidirectional without fanning
 Diffuser alignment angle
                                  GAMMA = 90 deg
 Vertical discharge angle THETA = 0 deg
 Actual Vertical discharge angle THEAC = 0 deg
```

 $RHOO = 993.0346 \text{ kg/m}^3$

DRHO = 4.0110 kg/m^3

Buoyant acceleration GP0 = 0.0395 m/s^2 Discharge concentration C0 = 37.800000 deg.CSurface heat exchange coeff. KS = 0 m/sCoefficient of decay KD = 0 /s

Horizontal discharge angle SIGMA = 0 degRelative orientation angle BETA = 90 degDischarge temperature (freshwater) = 37.80 degC

Corresponding density

Density difference

PERMIT No.: KY0072231 Fact Sheet Attachment C

Page C-6

CORMIX2 SESSION REPORT:

```
FLUX VARIABLES PER UNIT DIFFUSER LENGTH:
 Discharge (volume flux) q0 = 0.000725 \text{ m}^2/\text{s}

Momentum flux m0 = 0.000545 \text{ m}^3/\text{s}^2

Buoyancy flux j0 = 0.000029 \text{ m}^3/\text{s}^3
 ______
(These refer to the actual discharge/environment length scales.)
NON-DIMENSIONAL PARAMETERS:
Slot Froude number
                         FR0 = 121.71
 Port/nozzle Froude number FRD0 = 121./1
Velocity ratio FRD0 = 16.91
R = 8.17
MIXING ZONE / TOXIC DILUTION ZONE / AREA OF INTEREST PARAMETERS:
 Toxic discharge
                              = no
 Water quality standard specified = yes
 Water quality standard CSTD = 31.700000 \text{ deg.C}
 Regulatory mixing zone
                            = no
 Region of interest
                                 = 5000 m downstream
********************
HYDRODYNAMIC CLASSIFICATION:
 *____*
  | FLOW CLASS = IMPU7 |
 *----*
 This flow configuration applies to a layer corresponding to the full water
 depth at the discharge site.
 Applicable layer depth = water depth = 4.57 m
******************
MIXING ZONE EVALUATION (hydrodynamic and regulatory summary):
X-Y-Z Coordinate system:
 Origin is located at the bottom below the port center:
   6.09 m from the left bank/shore.
 Number of display steps NSTEP = 800 per module.
______
NEAR-FIELD REGION (NFR) CONDITIONS :
Note: The NFR is the zone of strong initial mixing. It has no regulatory
 implication. However, this information may be useful for the discharge
 designer because the mixing in the NFR is usually sensitive to the
 discharge design conditions.
 Pollutant concentration at NFR edge c = 0.0648 deg.C
 Dilution at edge of NFR
                               s = 583.6
 NFR Location:
                               x = 3.05 m
                               y = 0 m
   (centerline coordinates)
                                z = 4.57 \text{ m}
 NFR plume dimensions: half-width (bh) = 3.03 \text{ m}
                    thickness (bv) = 4.57 \text{ m}
Cumulative travel time: 32.695 sec.
______
Buovancy assessment:
 The effluent density is less than the surrounding ambient water
 density at the discharge level.
 Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards
 the surface.
```

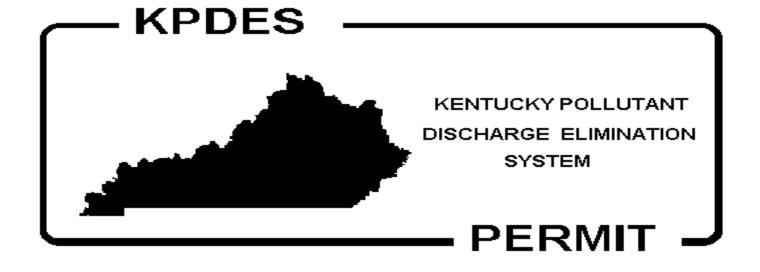
PERMIT No.: KY0072231 Fact Sheet Attachment C

Page C-7

CORMIX2 SESSION REPORT:

Near-field instability behavior: The diffuser flow will experience instabilities with full vertical mixing in the near-field. There may be benthic impact of high pollutant concentrations. FAR-FIELD MIXING SUMMARY: Plume is vertically fully mixed WITHIN NEAR-FIELD (or a fraction thereof), but RE-STRATIFIES LATER. Plume becomes vertically fully mixed again at 409.84 m downstream. PLUME BANK CONTACT SUMMARY: Plume in bounded section contacts one bank only at 30.88 m downstream. ******************** TOXIC DILUTION ZONE SUMMARY **************** No TDZ was specified for this simulation. No RMZ has been specified. However: The ambient water quality standard was encountered at the following plume position: Water quality standard = 31.700000 deg.CCorresponding dilution s = 1.2x = 0.00 mPlume location: y = 0 m(centerline coordinates) z = 3.05 mhalf-width (bh) = 3.05 mPlume dimensions: thickness (bv) = 0.00 m********* ***** FINAL DESIGN ADVICE AND COMMENTS *************** CORMIX2 uses the TWO-DIMENSIONAL SLOT DIFFUSER CONCEPT to represent the actual three-dimensional diffuser geometry. Thus, it approximates the details of the merging process of the individual jets from each port/nozzle. In the present design, the spacing between adjacent ports/nozzles (or riser assemblies) is of the order of, or less than, the local water depth so that the slot diffuser approximation holds well. Nevertheless, if this is a final design, the user is advised to use a final CORMIX1 (single port discharge) analysis, with discharge data for an individual diffuser jet/plume, in order to compare to the present near-field prediction. ______ REMINDER: The user must take note that HYDRODYNAMIC MODELING by any known technique is NOT AN EXACT SCIENCE. Extensive comparison with field and laboratory data has shown that the CORMIX predictions on dilutions and concentrations (with associated plume geometries) are reliable for the majority of cases and are accurate to within about +-50% (standard deviation). As a further safeguard, CORMIX will not give predictions whenever it judges

the design configuration as highly complex and uncertain for prediction.



PERMIT NO.: KY0072231

AUTHORIZATION TO DISCHARGE UNDER THE KENTUCKY POLLUTANT DISCHARGE ELIMINATION SYSTEM

Pursuant to Authority in KRS 224,

Gerdau Ameristeel US Inc. P.O. Box 468 Calvert City, Kentucky 42029

is authorized to discharge from a facility located at

Gerdau Ameristeel US Inc. 1035 Shar-Cal Road Calvert City, Marshall County, Kentucky

to receiving waters named

Outfall 001 discharges to the Tennessee River at latitude $37^{\circ}03'12"$ longitude $88^{\circ}23'51"$. Outfall 002 is an internal outfall to 001.

Outfall 003 discharges to an unnamed tributary to Little Cypress Creek at latitude $37^{\circ}02'52"$ longitude $88^{\circ}23'30"$.

in accordance with effluent limitations, monitoring requirements, and other conditions set forth in PARTS I, II, III, IV, and V. The permit consists of this cover sheet, and PART I $\underline{4}$ pages, PART II $\underline{1}$ page, PART III $\underline{2}$ pages, PART IV $\underline{3}$, and PART V $\underline{3}$ pages.

This permit shall become effective on

This permit and the authorization to discharge shall expire at midnight,

Date Signed

Sandra L. Gruzesky, Director Division of Water

Permit No.: KY0072231

A1. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the term of this permit, the permittee is authorized to discharge from Outfall serial number: 001 - Process, cooling (contact and non-contact), filter backwash, and sanitary (internal Outfall 002) wastewaters and stormwater runoff are treated in the settling clarifier prior to discharge.

Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTICS		DISCHARGE I	LIMITATIONS		MONITORING REQUIREMENTS		
	(lbs/ Monthly Avg.	day) Daily Max.	Other Units (S Monthly Avg.	Specify) Daily Max.	Measurement Frequency	Sample Type	
Flow (MGD)	N/A	N/A	Report	Report	2/Month	Instantaneous	
Hardness (as mg/l CaCO3)	N/A	N/A	Report	Report	2/Month	Grab	
Total Suspended Solids	37.3	94.0	N/A	N/A	2/Month	Grab	
Oil & Grease	N/A	20.4	N/A	N/A	2/Month	Grab	
Temperature (°F)	N/A	N/A	95	100	2/Month	Grab	
Total Recoverable Metals (mg/l)	N/A	N/A	Report	Report	1/Quarter	Grab	
Acute Toxicity (TUa)	N/A	N/A	N/A	5.19	1/Quarter	Grab	

The pH of the effluent shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 2/Month by Grab sample.

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: nearest accessible point prior to discharge to or mixing with the receiving waters or wastestreams from other outfalls.

The term Total Recoverable Metals means those metals listed on Form C, Section V, Part C - Metals, Cyanide, and Total Phenols: Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc. Total Recoverable Metals shall be monitored once per quarter by grab sample. The results of the analyses shall be total and reported as a single concentration on the DMR. The laboratory bench sheets showing the results for each metal shall be attached to the DMR.

Acute Toxicity shall be monitored once per quarter by a minimum of two (2) grab samples collected over a 24-hour period as descriped in Part V of the Permit.

The abbreviation N/A means not applicable.

Permit No.: KY0072231

A2. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the term of this permit, the permittee is authorized to discharge from Outfall serial number: 002 - Internal monitoring point for the sanitary wastewaters prior to discharge through Outfall 001.

Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTICS		DISCHARGE	LIMITATIONS	MONITORING REQUIREMENTS		
	(lbs/ Monthly Avg.	day) Daily Max.	Other Units (Monthly Avg.	Specify) Daily Max.	Measurement Frequency	Sample Type
Flow (MGD)	N/A	N/A	Report	Report	1/Month	Instantaneous
$BOD_5 \ (mg/1)$	N/A	N/A	30	45	1/Month	Grab
Total Suspended Solids (mg/l)	N/A	N/A	30	45	1/Month	Grab
Fecal Coliform Bacteria	Removing	from Permit				
Escherichia Coli (N/100 ml)	N/A	N/A	130	240	1/Month	Grab
Ammonia Nitrogen (as mg/l N)	N/A	N/A	20	30	1/Month	Grab
Dissolved Oxygen (mg/l) (minimum)	N/A	N/A	Not less than	n 2.0	1/Month	Grab

The pH of the effluent shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 1/Month by Grab sample.

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: nearest accessible point prior to discharge to or mixing with the receiving waters or wastestreams from other outfalls.

The abbreviation N/A means Not Applicable.

The abbreviation BOD_5 means Biochemical Oxygen Demand (5-day).

The effluent limitations for BOD, and Total Suspended Solids are Monthly Averages and Weekly Averages.

The effluent limitations for Escherichia Coli are 30 day and 7 day Geometric Means.

PART I Page I-3

Permit No.: KY0072231

A3. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the term of this permit, the permittee is authorized to discharge from Outfall serial number: 003 - No treatment of stormwater runoff.

Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS		
	(lbs/ Monthly <u>Avg.</u>	day) Daily <u>Max.</u>	Other Units (S Monthly Avg.	Specify) Daily Max.	Measurement Frequency	Sample Type
Flow (MGD)	N/A	N/A	Report	Report	1/Month	Instantaneous
Precipitation (inches)	N/A	N/A	Report	Report	1/Month	Grab
Hardness (as mg/l CaCO ₃)	N/A	N/A	Report	Report	1/Month	Grab
Total Suspended Solids (mg/l)	N/A	N/A	Report	Report	1/Month	Grab
Oil & Grease (mg/l)	N/A	N/A	Report	Report	1/Month	Grab
Total Recoverable Metals (mg/l)	N/A	N/A	Report	Report	1/Quarter	Grab

The pH of the effluent shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 1/Month by Grab sample.

There shall be no discharge of floating solids or visible foam or sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: nearest accessible point prior to discharge to or mixing with the receiving waters or wastestreams from other outfalls.

The abbreviation N/A means Not Applicable.

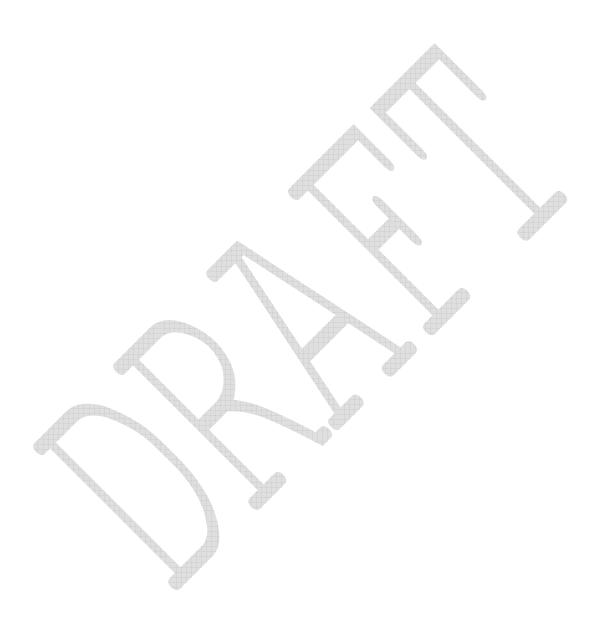
The term Total Recoverable Metals means those metals listed on Form C, Section V, Part C - Metals, Cyanide, and Total Phenols: Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc. Total Recoverable Metals shall be monitored once per discharge, but no more frequently than once per quarter, by grab sample. The results of the analyses shall be total and reported as a single concentration on the DMR. The laboratory bench sheets showing the results for each metal shall be attached to the DMR.

PART I Page I-4

Permit No.: KY0072231

B. Schedule of Compliance

The permittee shall achieve compliance with all requirements on the effective date of this permit or as specified by the permit.



Permit No.: KY0072231

STANDARD CONDITIONS FOR KPDES PERMIT

The permittee is also advised that all KPDES permit conditions in KPDES Regulation 401 KAR 5:065, Section 1 will apply to all discharges authorized by this permit.

This permit has been issued under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits or licenses required by this Cabinet and other state, federal, and local agencies.

It is the responsibility of the permittee to demonstrate compliance with permit parameter limitations by utilization of sufficiently sensitive analytical methods.



PART III Page III-1

Permit No.: KY0072231

PART III

OTHER REQUIREMENTS

A. Reporting of Monitoring Results

Monitoring results obtained during each monitoring period must be reported on a preprinted Discharge Monitoring Report (DMR) Form that will be mailed to you. The completed DMR for each monitoring period must be sent to the Division of Water at the address listed below (with a copy to the appropriate Regional Office) postmarked no later than the 28th day of the month following the monitoring period for which monitoring results were obtained.

Division of Water Paducah Regional Office 130 Eagle Nest Drive Paducah, Kentucky 42003 ATTN: Supervisor Energy & Environment Cabinet Dept. for Environmental Protection Division of Water/SWP Branch 200 Fair Oaks Lane Frankfort, Kentucky 40601

B. Reopener Clause

This permit shall be modified, or alternatively revoked and reissued, to comply with any applicable effluent standard or limitation issued or approved under 401 KAR 5:050 through 5:086, if the effluent standard or limitation so issued or approved:

- 1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- 2. Controls any pollutant not limited in the permit.

The permit as modified or reissued under this paragraph shall also contain any other requirements of KRS Chapter 224 when applicable.

C. Cooling Water Additives, FIFRA, and Mollusk Control

The discharge of any product registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) in cooling water which ultimately may be released to the waters of the Commonwealth is prohibited, except Herbicides, unless specifically identified and authorized by the KPDES permit. In the event the permittee needs to use a biocide or chemical not previously reported for mollusk control or other purpose, the permittee shall submit sufficient information, a minimum of thirty (30) days prior to the commencement of use of said biocides or chemicals, to the Division of Water for review and establishment of appropriate control parameters. Such information requirements shall include:

- 1. Name and general composition of biocide or chemical,
- 2. Any and all aquatic organism toxicity data,
- 3. Quantities to be used,
- 4. Frequencies of use,
- 5. Proposed discharge concentrations, and
- 6. EPA registration number, if applicable.

PART III Page III-2

Permit No.: KY0072231

D. Outfall Signage

The permittee shall post a permanent marker at all discharge locations and/or monitoring points. The marker shall be at least 2 feet by 2 feet in size and a minimum of 3 feet above ground level with the Permittee Name and KPDES permit and outfall numbers in 2 inch letters. For internal monitoring points the marker shall be of sufficient size to include the outfall number in 2 inch letters and shall be posted as near as possible to the actual sampling location.

E Mixing Zone

The assigned mixing zones for the discharge at Outfall 001 shall have the following dimensions:

Toxicity:

Linear Distance from Point of Discharge:
Maximum Surface Area Involved:
Volume of Receiving Water:

Temperature:

Linear Distance from Point of Discharge: Maximum Surface Area Involved: Volume of Receiving Water: 0.033 feet in any direction 8.56×10^{-4} square feet 500 cfs (323 MGD)

0.0056 feet in any direction 2.47×10^{-5} square feet 500 cfs (323 MGD)



PART IV Page IV-1

Permit No.: KY0072231

PART IV

BEST MANAGEMENT PRACTICES

SECTION A. GENERAL CONDITIONS

1. Applicability

These conditions apply to all permittees who use, manufacture, store, handle, or discharge any pollutant listed as: (1) toxic under Section 307(a)(1) of the Clean Water Act; (2) oil, as defined in Section 311(a)(1) of the Act; (3) any pollutant listed as hazardous under Section 311 of the Act; or (4) is defined as a pollutant pursuant to KRS 224.01-010(35) and who have ancillary manufacturing operations which could result in (1) the release of a hazardous substance, pollutant, or contaminant, or (2) an environmental emergency, as defined in KRS 224.01-400, as amended, or any regulation promulgated pursuant thereto (hereinafter, the "BMP pollutants"). These operations include material storage areas; plant site runoff; in-plant transfer, process and material handling areas; loading and unloading operations, and sludge and waste disposal areas.

2. BMP Plan

The permittee shall develop and implement a Best Management Practices (BMP) plan consistent with 401 KAR 5:065, Section 2(10) pursuant to KRS 224.70-110, which prevents or minimizes the potential for the release of "BMP pollutants" from ancillary activities through plant site runoff; spillage or leaks, sludge or waste disposal; or drainage from raw material storage. A Best Management Practices (BMP) plan will be prepared by the permittee unless the permittee can demonstrate through the submission of a BMP outline that the elements and intent of the BMP have been fulfilled through the use of existing plans such as the Spill Prevention Control and Countermeasure (SPCC) plans, contingency plans, and other applicable documents.

3. Implementation

If this is the first time for the BMP requirement, then the plan shall be developed and submitted to the Division of Water within 90 days of the effective date of the permit. Implementation shall be within 180 days of that submission. For permit renewals the plan in effect at the time of permit reissuance shall remain in effect. Modifications to the plan as a result of ineffectiveness or plan changes to the facility shall be submitted to the Division of Water and implemented as soon as possible.

4. General Requirements

The BMP plan shall:

- a. Be documented in narrative form, and shall include any necessary plot plans, drawings, or maps.
- b. Establish specific objectives for the control of toxic and hazardous pollutants.
 - (1) Each facility component or system shall be examined for its potential for causing a release of "BMP pollutants" due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc.

PART IV Page IV-2

Permit No.: KY0072231

- (2) Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g., precipitation), or other circumstances which could result in a release of "BMP pollutants," the plan should include a prediction of the direction, rate of flow, and total quantity of the pollutants which could be released from the facility as result of each condition or circumstance.
- c. Establish specific Best Management Practices to meet the objectives identified under paragraph b of this section, addressing each component or system capable of causing a release of "BMP pollutants."
- d. Include any special conditions established in part b of this section.
- e. Be reviewed by plant engineering staff and the plant manager.

5. Specific Requirements

The plan shall be consistent with the general guidance contained in the publication entitled "NPDES Best Management Practices Guidance Document," and shall include the following baseline BMPs as a minimum.

- a. BMP Committee
- b. Reporting of BMP Incidents
- c. Risk Identification and Assessment
- d. Employee Training
- e. Inspections and Records
- f. Preventive Maintenance
- g. Good Housekeeping
- h. Materials Compatibility
- i. Security
- j. Materials Inventory

6. SPCC Plans

The BMP plan may reflect requirements for Spill Prevention Control and Countermeasure (SPCC) plans under Section 311 of the Act and 40 CFR Part 151, and may incorporate any part of such plans into the BMP plan by reference.

7. Hazardous Waste Management

The permittee shall assure the proper management of solid and hazardous waste in accordance with the regulations promulgated under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1978 (RCRA) (40 U.S.C. 6901 et seq.) Management practices required under RCRA regulations shall be referenced in the BMP plan.

8. Documentation

The permittee shall maintain a description of the BMP plan at the facility and shall make the plan available upon request to NREPC personnel. Initial copies and modifications thereof shall be sent to the following addresses when required by Section 3:

Division of Water
Paducah Regional Office
130 Eagle Nest Drive
Paducah, Kentucky 42003
ATTN: Supervisor

Energy & Environment Cabinet
Dept. for Environmental Protection
Division of Water/SWP Branch
200 Fair Oaks Lane
Frankfort, Kentucky 40601

PART IV Page IV-3

Permit No.: KY0072231

9. BMP Plan Modification

The permittee shall amend the BMP plan whenever there is a change in the facility or change in the operation of the facility which materially increases the potential for the ancillary activities to result in the release of "BMP pollutants."

10. Modification for Ineffectiveness

If the BMP plan proves to be ineffective in achieving the general objective of preventing the release of "BMP pollutants," then the specific objectives and requirements under paragraphs b and c of Section 4, the permit, and/or the BMP plan shall be subject to modification to incorporate revised BMP requirements. If at any time following the issuance of this permit the BMP plan is found to be inadequate pursuant to a state or federal site inspection or plan review, the plan shall be modified to incorporate such changes necessary to resolve the concerns.

SECTION B. SPECIFIC CONDITIONS

Periodically Discharged Wastewaters Not Specifically Covered By Effluent Conditions

The permittee shall include in this BMP plan procedures and controls necessary for the handling of periodically discharged wastewaters such as intake screen backwash, meter calibration, fire protection, hydrostatic testing water, water associated with demolition projects, etc.

PART V Page V-1

Permit No.: KY0072231

PART V

BIOMONITORING - Acute CONCERNS

In accordance with PART I of this permit, the permittee shall initiate, within 30 days of the effective date of this permit, or continue the series of tests described below to evaluate wastewater toxicity of the discharge from Outfall 001.

TEST REQUIREMENTS

The permittee shall perform a 48-hour static non-renewal toxicity test with water flea (Ceriodaphnia dubia) and a 48-hour static non-renewal toxicity test with fathead minnow (Pimephales promelas). Tests shall be conducted on each of two grab samples taken over a 24-hour period approximately 12 hours apart (e.g. discrete sample #1 taken at 9:00 a.m., sample #2 taken at 9:00 p.m.). In addition to use of a control, effluent concentrations for the tests must include the permitted limit, (i.e., 16.92% effluent) and at least four additional effluent concentrations. For a permit limit of 100% effluent, test concentrations shall be 20%, 40%, 60%, 80% and 100%. permit limit is less than 100% effluent and greater than or equal to 75% effluent, the test concentrations shall include the permitted limit, two concentrations below the limit that are based on a 0.5 dilution factor, and two concentrations above the limit (to include 100% and mid-point between the permit limit and 100%). If the permit limit is less than 75% effluent, test concentrations shall include the permit limit concentration, two concentrations below the limit based on a 0.5 dilution factor, and two concentrations above the limit based on a 0.5 dilution factor if possible, otherwise to include 100% and mid-point between the permit limit and 100% . Selection of different effluent concentrations must be approved by the Division prior to testing. Testing of the effluent shall be initiated within 36 hours of each sample collection. Controls shall be conducted concurrently with effluent testing using synthetic water. The analysis will be deemed reasonable and good only if control survival is 90% or greater in test organisms held in synthetic water. Any test that does not meet the control acceptability criteria shall be repeated as soon as practicable within the monitoring period (i.e. monthly or quarterly). Noncompliance with the toxicity limit will be demonstrated if the LC_{50} is less than 16.92% effluent.

Tests shall be conducted on both species at the frequency specified in PART I of this permit.

If after at least six consecutive toxicity tests it can be determined that Ceriodaphnia dubia or the fathead minnow is more sensitive and all tests have passed, a request for testing with only the most sensitive species can be submitted to the Division. Upon approval, that most sensitive species may be considered as representative and all subsequent compliance tests can be conducted using only that species unless directed at any time by the Division to change or revert to both.

REPORTING REQUIREMENTS

Results of all toxicity tests conducted with any species shall be reported according to the most recent format provided by the Division of Water. Notification of failed test shall be made to the Division's Water Quality Branch within five days of test completion. Test reports shall be submitted to the Division's Water Quality Branch within thirty (30) days of completion.

Permit No.: KY0072231

PART V - BIOMONITORING - ACUTE CONCERNS

ACUTE TOXICITY

If noncompliance with the toxicity limit occurs in an initial test, (i.e., the LC_{50} for either species in either grab sample is less than 16.92% effluent), the permittee must repeat the test using new grab samples collected approximately 12 hours apart. Sampling must be initiated within 10 days of completing the failed test. The second round of testing shall include both species unless approved for only the most sensitive species by the Division. Results of the second round of testing will be used to evaluate the persistence of the toxic event and the possible need for a Toxicity Reduction Evaluation (TRE).

If the second round of testing also demonstrates noncompliance with the toxicity limit, the permittee will be required to perform accelerated testing as specified in the following paragraphs.

Complete four additional rounds of testing to evaluate the frequency and degree of toxicity within 60 days of completing the second failed round of testing. Results of the initial and second rounds of testing specified above plus the four additional rounds of testing will be used in deciding if a TRE shall be required.

If results from any two of six rounds of testing show a significant noncompliance with the acute limit, (i.e., ≥ 1.2 times the TU_a), or results from any four of the six tests show acute toxicity (as defined in 1.A), a TRE will be required.

The permittee shall provide written notification to the Division of Water within five (5) days of completing the accelerated testing, stating that: (1) toxicity persisted and that a TRE will be initiated; or (2) that toxicity did not persist and normal testing will resume.

Should toxicity prove not to be persistent during the accelerated testing period, but reoccur within 12 months of the initial failure at a level \bullet 1.2 times the TU_a , then a TRE shall be required.

TOXICITY REDUCTION EVALUATION (TRE)

Having determined that a TRE is required, the permittee shall initiate and/or continue at least monthly testing with both species until such time as a specific TRE plan is approved by the Division. A TRE plan shall be developed by the permittee and submitted to the Division within thirty days of determining a TRE is required. The plan shall be developed in accordance with the most recent EPA and Division guidance. Questions regarding this process may be submitted to the Division's Water Quality Branch.

The TRE plan shall include Toxic Identification Evaluation (TIE) procedures, treatability studies, and evaluations of: chemical usage including changes in types, handling and suppliers; operational and process procedures; housekeeping and maintenance activities; and raw materials. The TRE plan will establish an implementation schedule to begin immediately upon approval by the Division, to have duration of at least six months, and not to exceed 24 months. The implementation schedule shall include quarterly progress reports being submitted to the Division's Water Quality Branch, due the last day of the month following each calendar quarter.

PART V Page V-3

Permit No.: KY0072231

PART V - BIOMONITORING - ACUTE CONCERNS

TOXICITY REDUCTION EVALUATION (TRE)

Upon completion of the TRE, the permittee shall submit a final report detailing the findings of the TRE and actions taken or to be taken to prevent the reoccurrence of toxicity. This final report shall include: the toxicant(s), if any are identified; treatment options; operational changes; and the proposed resolutions including an implementation schedule not to exceed 180 days.

Should the permittee determine the toxicant(s) and/or a workable treatment prior to the planned conclusion of the TRE, the permittee will notify the Division's Water Quality Branch within five days of making that determination and take appropriate actions to implement the solution within 180 days of that notification.

TEST METHODS

All test organisms, procedures, and quality assurance criteria used shall be in accordance with Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, EPA-821-R-02-012 (5th edition), the most recently published edition of this publication, or as approved in advance by the Division of Water.

Toxicity testing for compliance to KPDES discharge limits shall be performed by a laboratory approved by the Division of Water to conduct the required toxicity tests. Within each toxicity report to the Division, the permittee must demonstrate successful performance of reference toxicant testing by the laboratory that conducts their effluent toxicity tests. Within 30 days prior to initiating an effluent toxicity test, a reference toxicant test must be completed for the method used; alternatively, the reference toxicant test may be run concurrent with the effluent toxicity test. In addition, for each test method, at least 5 acceptable reference toxicant tests must be completed by the laboratory prior to performing the effluent toxicity test. A control chart including the most recent reference toxicant test endpoints for the effluent test method (minimum of 5, up to 20 if available) shall be part of the report.